

INFORMATION ON THE PROCESSING OF PERSONAL DATA CUSTOMERS and SUPPLIERS

Art 13 - 14 EU Reg 2016/679

In relation to the processing of personal data provided, we inform you that:

1. Data Controller and Data Protection Officer (DPO)

The Data Controller is the company Marcolin S.p.A., with registered office in Zona Industriale Villanova 4, 32013 Longarone (BL), VAT number 00298010257 (hereinafter referred to as "the Company" or the "Data Controller").

The Company has also appointed the Data Protection Officer (DPO) whose contact details are: dpo@marcolin.com.

2. Type of data processed, Purpose and legal basis of the Processing

The following are collected and processed:

i) personal data of a common nature (contact details, name, surname, personal data, role, e-mail) of the Customer/Supplier/personnel of the customer or supplier for pre-contractual purposes and for the execution of the contractual relationship and for administrative-accounting-tax obligations related to invoicing.

The legal basis for data processing is therefore the fulfilment of contractual obligations and legal obligations.

ii) personal data of a common nature such as contact details, name, surname, personal data, role, e-mail address of the Customer/customer staff, subject to consent, for the purpose of sending marketing communications (i.e. such as newsletter communications, invitations to events). The legal basis for data processing is consent to receive marketing and commercial communications.

iii) personal data of a common nature such as contact details, name, surname, personal data, role, e-mail of the Customer/customer staff for the purpose of sending commercial communications for products or services identical or similar to the products/services covered by the contract with the customer (soft spam), survey and updating of company services to the customer, unless the customer objects. The legal basis for data processing is therefore the legitimate interest aimed at improving the contractual service and customer satisfaction.

3. Communication of data to third parties - Recipients of the data

The Company may communicate the data processed for the above purposes to: i) internal company subjects in charge of processing; ii) external parties belonging to the following categories: external consultants, service companies (transport, shipping, marketing and IT services, tax and credit services), the company's sales network (agents), banking institutions, control bodies and bodies; iii) other companies of the Group.

4. Transfer of data to third countries

The processed data may be transferred to third countries. In the event of any transfer, the same will take place in compliance with the regulations in force from time to time on the transfer of data to third countries.

5. Data processing methods, period and data retention criteria

The data will be processed in paper and digital format and will be stored for the period necessary for the execution of the aforementioned purposes(s), and in particular, respectively:

- i) for the statutory limitation period relating to the retention of contracts and administrative data and/or for legal defence if necessary (ten years from the last use and/or interruption of the statute of limitations);
- ii) for dissent/output of the data subject, or until the unsubscription from marketing communications and up to a maximum of 2 (years) from the last consent issued or from the last expression of interest;
- iii) for the duration of the contractual relationship and in any case up to a maximum of 2 (years) from the last expression of interest.

6. Provision of data

The provision of the data referred to in point 2 must be considered:

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- i) mandatory for the execution of the contractual relationship and for legal purposes. Failure to provide data will make it impossible to pursue the purposes indicated above.
- ii) optional for marketing communications, so much so that the data subject may at any time object to the processing by expressing dissent/output in the dedicated section "Preference management or unsubscribe" found at the bottom of each communication;
- iii) optional for surveys and for updating company services and soft spam communications to the customer, since the customer can object to the processing by expressing dissent/output in the dedicated section "Preference management | Unsubscribe" can be found at the bottom of each communication

7. Rights of the Data Subject, Withdrawal of Consent and Complaint to the Supervisory Authority

The data subject has the right at any time to request access to his or her personal data, rectification, erasure, restriction of the same, to object to processing and to exercise the right to data portability.

In any case, the data subject has the right to revoke any consent given to the processing of data at any time, without prejudice to the lawfulness of the processing based on the consent given before the withdrawal.

In the event of an alleged violation, the data subject, if the conditions are met, also has the right to lodge a complaint with a Data Processing Supervisory Authority located in the EU member state where he or she habitually resides or in the EU state where he or she works or in which the alleged violation occurred.

8. Profiling and automated decision-making

The processing is not carried out by automated decision-making processes (e.g. profiling).

9. Contacts and requests

To know the complete list of Privacy Delegates appointed for each area and activity and of the Data Processors/to obtain more information regarding the transfer of data to non-EU countries, the mechanisms and safeguards for the transfer of data pursuant to Article 44 et seq. of the GDPR/ to exercise the revocation of any consent given/ to exercise your rights (access, rectification, cancellation, limitation, opposition, portability) can send a request to the email contact: info@marcolin.com.